

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

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UNITED STATES OF AMERICA,

CR 19-50156

Plaintiff,

REDACTED SUPERSEDING  
INDICTMENT

vs.

Theft of Government Property  
(18 U.S.C. § 641)

HOLLI LUNDAHL,  
a/k/a Holli Telford,

Supplemental Security Income  
Benefits Fraud  
(42 U.S.C. § 1383a(a)(3)(A))

Defendant.

False Statement  
(18 U.S.C. § 1001)

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The Grand Jury charges:

COUNT I

On or about between January 1, 2014, and April 15, 2019, in the District of South Dakota and elsewhere, the defendant, Holli Lundahl, a/k/a Holli Telford, willfully and knowingly did embezzle, steal, purloin, and knowingly convert to her own use money of the United States Social Security Administration, a department and agency of the United States, namely Title XVI Social Security Supplemental Income payments to which she knew she was not entitled, having a value in excess of \$1,000, all in violation of 18 U.S.C. § 641.

COUNT II

On or about between January 1, 2014, and April 15, 2019, in the District of South Dakota and elsewhere, the defendant, Holli Lundahl, a/k/a Holli Telford, having knowledge of the occurrence of an event affecting her initial and

continued right to receive payment of Title XVI Social Security Supplemental Income (SSI) payments, concealed and failed to disclose such event with the intent to fraudulently secure payment when no payment was authorized. Specifically, between January 2014 and April 2019, the defendant, Holli Lundahl, a/k/a Holli Telford, falsely reported her resources and assets and concealed and fail to disclose her resources and assets, in order to continue to receive and spend SSI benefit payments made by the Social Security Administration to the defendant, all in violation of 42 U.S.C. § 1383a(a)(3)(A).

### COUNT III

On or about March 28, 2019, in the District of South Dakota, the defendant, Holli Lundahl, a/k/a Holli Telford, in a matter within the jurisdiction of the United States Social Security Administration, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations during a non-medical review with a Social Security Administration Claims Specialist, to wit, by failing to disclose that she had joint access to a Black Hills Federal Credit Union checking account containing in excess of \$25,000, between September 2018 through March 2019, when in fact, as she was then well aware, \$25,000 had been deposited into and remained in that account during that time period, and by failing to disclose that she had an ownership interest in property located in Smith County, Texas, when in fact, as she was then well aware, she maintained an ownership interest in said property, which income and property

would have affected the defendant's right to ongoing Social Security Supplement Income benefit payments, all in violation of 18 U.S.C. § 1001.

COUNT IV

On or about between December 10, 2018, and December 20, 2018, in the District of South Dakota, the defendant, Holli Lundahl, a/k/a Holli Telford, in a matter within the jurisdiction of the United States District Court for the District of South Dakota, and the United States Court of Appeals for the Eighth Circuit, knowingly and willfully made and used a false writing and document, knowing the same to contain a materially false, fictitious, or fraudulent statement and entry, to wit, the defendant filed a Notice of Appeal in Telford v. Bradeen, et al., No. 5:17cv5042, which document contained a date stamp the defendant had forged, all in violation of 18 U.S.C. § 1001.

A TRUE BILL:

**NAME REDACTED**

\_\_\_\_\_  
Foreperson

RONALD A. PARSONS, JR.  
United States Attorney

By:  \_\_\_\_\_